

## REMARKS

Reconsideration of the application is respectfully requested for the following reasons:

1. Amendments to Claims

Claim 1 has been amended to recite that the resilient sheets curve away from the plane of the substrate at a nonzero angle, as illustrated in Fig. 4A. In addition, claim 1 has been amended to recite that the distance between the free sections of the sheets is “*slightly larger than a maximal diameter of the threaded section of the connector*” as illustrated in Fig. 4A and described in lines 1-2 on page 4 of the original specification. Finally, claim 1 has been amended to recite that the free sections are arranged to be pressed into the plane of the substrate, at which point they engage the threaded section to fasten the connector to the substrate “*without the need for a nut,*” as illustrated in Fig. 4B and described in lines 5-8 on page 4 of the original specification.

Because the subject matter added to claim 1 is clearly illustrated in Figs. 4A and 4B, and described in the original specification, it is respectfully submitted that they do not involve **new matter**. The one addition to the specification, that the free sections are at a “**nonzero angle,**” is clearly shown in original Fig. 4A and therefore also does not involve **new matter**.

In addition to the above-mentioned substantive changes to claim 1, claims 2, 3, 5, 7, and 10 have been amended to correct the formal errors noted in item 1 on page 2 of the Official Action by adopting each of the Examiner’s suggestions.

2. Rejection of Claims 1-13 Under 35 USC §102(b) in view of U.S. Patent No. 4,687,446 (Birch)

This rejection is respectfully traversed on the grounds that the Birch patent fails to disclose or suggest a fastening structure for a connector in which the distance between the free ends of the curved sections is greater than a *maximal* diameter of a *threaded* portion of the

connector so that pressing the free ends into the plane of the substrate fastens the connector to the substrate, as now recited in claim 1, and illustrated in Figs. 4A and 4B of the present application.

According to the Examiner, Fig. 3 of the Birch patent discloses a fastening structure wherein the distance between the free sections is slightly larger than the diameter of (portions of) the connector. However, Fig. 3 of the Birch patent does not show that the distance between free ends for the substrate is larger than the *maximal* diameter of the portion of the connector engaged by the free ends, and in particular larger than a *maximal* diameter of a *threaded* portion of the connector. Instead, the distance between the free ends of “clip” 27 is clearly smaller than the maximal diameter of sleeve 15 of the connector of Birch, and the sleeve 15 in any case merely includes a “roughened surface” 28 rather than a threaded portion. By using threads instead of a roughened portion, and by pressing the free ends into engagement with the threaded portion, the claimed connector provides a more secure fastening arrangement than that of Birch, which can be used with ordinary threaded connectors rather than the specially roughened connector of Birch.

Because the Birch patent does not disclose all elements recited in amended claim 1, from which claims 2-13 depend, withdrawal of the rejection under 35 USC §102(b) is respectfully requested.

3. Rejection of Claims 1-13 Under 35 USC §102(b) in view of U.S. Patent No. 6,083,041 (Kuo)

This rejection is respectfully traversed on the grounds that the Kuo patent, like the Birch patent, fails to disclose or suggest a fastening structure for a connector in which the distance between the free ends of the curved sections is greater than a *maximal* diameter of a *threaded* portion of the connector so that pressing the free ends into the plane of the substrate fastens the connector to the substrate, as now recited in claim 1, and illustrated in Figs. 4A and 4B of the present application.

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Instead, the connector of Kuo snaps into place so that the distance between the free ends of the sheets must be less than a *maximal* diameter of the connector (the claims having been amended to preclude the “portions of” interpretation taken by the Examiner), and the portion of the connector engaged by the free ends is not *threaded*.

Because the Kuo patent does not disclose all elements recited in amended claim 1, from which claims 2-13 depend, withdrawal of the rejection under 35 USC §102(b) is respectfully requested.

Having thus overcome each of the rejections made in the Official Action, withdrawal of the rejections and expedited passage of the application to issue is requested.

Respectfully submitted,

BACON & THOMAS, PLLC

A handwritten signature in black ink, appearing to read 'B E Urcia', with a long horizontal line extending to the right.

By: BENJAMIN E. URCIA  
Registration No. 33,805

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BACON & THOMAS, PLLC  
625 Slaters Lane, 4th Floor  
Alexandria, Virginia 22314

Telephone: (703) 683-0500

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